

GAYLE HUBERT



Bob Holden, Governor • Stephen M. Mahfood, Director

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

P.O. Box 176 Jefferson City, MO 65102-0176

March 14, 2001

CERTIFIED MAIL Z 290 178 646
RETURN RECEIPT REQUESTED

Mr. Joseph W. Haake
Group Manager
Environmental and Hazardous
Materials Services
The Boeing Corporation
Dept. 464C, Bldg. 20
Mailcode S221-1400
St. Louis, MO 63155-0516

RE: Closure Reports for Tanks H19 and H20 and Building 14 Wastewater
Treatment Sludge Holding Tank; The Boeing Corporation, St. Louis

Dear Mr. Haake:

The Missouri Department of Natural Resources' Hazardous Waste Program has reviewed the sampling reports submitted for the above-referenced units at Boeing's St. Louis site, EPA ID#: MOD000818963. The closure of these units is not approved at this time. The following comments shall be used to submit revised closure plans for these units to be submitted within 60 days of receipt of this letter. The comments are made in accordance with 10 CSR 25-7.265(1) and (2).



R00179664

RCRA RECORDS CENTER

Comments:

The 1995 sampling of the H19 and H20 site shows additional levels of metals elevated above background. To remediate this area, it may be most regulatory expedient to excavate the soil, and take verification samples that show that all of the remaining soil is within background levels. If, however, Boeing chooses another course of action to deal with this contaminated soil the full extent of elevated metals concentrations must be determined and the ultimate remedy must be consistent with site-wide contaminated-soil cleanup goals.

To date, it does not appear that any sampling has occurred beneath the concrete pad on which tanks H19 and H20 sit. If such sampling has occurred, Boeing shall provide documentation. If not, Boeing shall take at least 2 samples in the top 1-foot interval of soil beneath the pad.

The subsurface exploration log notes that free phase oil, an oily sheen, and a petroleum odor were noted in the 5 to 7 foot interval of boring # H19-SE. This does not appear to be derived from tanks H19 and H20. In the investigation of SWMU #17, petroleum products were discovered in the subsurface. It is possible that this contamination is associated with those other petroleum products or is a separate area of concern. This matter is being referred to the Corrective Action Unit, which is overseeing all SWMU's and AOC's at the Boeing - St. Louis site, and will not be managed as part of this closure.

The December 27, 1993, letter from the Department to Mr. Joe Haake stating that the Building 14 Wastewater Tank may be exempt from RCRA regulations as a wastewater treatment unit stipulates that there must be no evidence of a past release from the unit. The RCRA Facility Assessment (RFA) for the site states that there are documented releases to the soil and the presence of cyanide and metals above background levels support this. Therefore, it cannot be stated with certainty that there have been no past release to soils, and this tank must be closed as a RCRA unit. Metals data needs to be collected from the north, east, and west sides of the tank. Metals and cyanide data need to be collected from below the tank considering the actual tank depth of 25 feet, not the perceived depth of 36 feet used during the original sampling.

The RFA for the site mentions the possibility of groundwater contamination below the Building 14 Wastewater Tank, although this may or may not be a perched aquifer. Boeing shall provide data to determine if possible releases to the tank have had an impact on groundwater below the tank.

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The closure documents do not state the intended future use of either the H19 and H20 tanks or the Building 14 Wastewater Tanks. The revised closure plan shall clarify the fate of the tanks so that appropriate decontamination or destruction may be determined.

If you have any questions regarding this letter, please contact me at (573) 751-3553.

Sincerely,

HAZARDOUS WASTE PROGRAM

Brian McCurren
Environmental Engineer
Permits Section

BM:kl

c: Ms. Gayle Hubert, State Coordinator, U.S. EPA Region VII
St. Louis Regional Office